

## **EXHIBIT 3**

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**From:** Jenkins, Robin E (Legal Affairs) <[rjenkins22@liberty.edu](mailto:rjenkins22@liberty.edu)>  
**Sent:** Thursday, April 6, 2023 9:53 AM  
**To:** Eckstein, Maya <[meckstein@hunton.com](mailto:meckstein@hunton.com)>  
**Cc:** King, Jeremy <[JKing@hunton.com](mailto:JKing@hunton.com)>; Shipman, Joseph C (Legal Affairs) <[jcshipman@liberty.edu](mailto:jcshipman@liberty.edu)>  
**Subject:** RE: [External] RE: Dropbox

**Caution: This email originated from outside of the firm.**

Ms. Eckstein,

Good morning.

We have just uploaded to the Dropbox link below 90 communications/documents that Liberty previously produced in the related state case (CL22000186-00) with the exception of one email with Caleb Mast which may be subject to the Motion to Quash filed by Mr. Melvin Williams, attorney for Caleb Mast. This production was the result of a search of Joshua Mast and Jonathan Mast's Liberty email accounts from September 1, 2019 to September 26, 2022 containing any of the following terms: (1) "████████", (2) "████████", (3) "████", (4) "████", (5) "████", (6) "████", (7) "Osmani." This production excludes emails between Joshua and Stephanie Mast and the following email accounts pursuant to an agreement between Joshua and Stephanie Mast and the plaintiff in that case: [RMast@lc.org](mailto:RMast@lc.org); [RLMast@liberty.edu](mailto:RLMast@liberty.edu); [RLMast@protonmail.com](mailto:RLMast@protonmail.com); [richard.l.mast.jr@gmail.com](mailto:richard.l.mast.jr@gmail.com); [hwbradburn@liberty.edu](mailto:hwbradburn@liberty.edu); [dschmid@lc.org](mailto:dschmid@lc.org); [daniel@lc.org](mailto:daniel@lc.org); [Mat@lc.org](mailto:Mat@lc.org); [MStaver@lc.org](mailto:MStaver@lc.org); [Jona@lc.org](mailto:Jona@lc.org); [JAlexandre@lc.org](mailto:JAlexandre@lc.org); [rachel@poarchlaw.com](mailto:rachel@poarchlaw.com); [Mary@lc.org](mailto:Mary@lc.org); [MMcAlister@childparentrights.org](mailto:MMcAlister@childparentrights.org); [tnoonan1@liberty.edu](mailto:tnoonan1@liberty.edu); [rlindevaldsen@liberty.edu](mailto:rlindevaldsen@liberty.edu); [rena@lc.org](mailto:rena@lc.org); [cynthianolandunbar@gmail.com](mailto:cynthianolandunbar@gmail.com); [cynthia@globaleducationadventures.com](mailto:cynthia@globaleducationadventures.com); [cynthia@globaleducationalventures.com](mailto:cynthia@globaleducationalventures.com) and [cdunbar\\_GEV@liberty.edu](mailto:cdunbar_GEV@liberty.edu); and [hannonwright@gmail.com](mailto:hannonwright@gmail.com). A search of Stephanie Mast's Liberty email account of the same terms and exclusions returned no hits. We believe these records are at least partially responsive to Requests (1) – (6) of your Subpoena.

On our call, we informed you that our initial search of *all* Liberty email accounts returned over 5,000 results. It turns out that that search yielded over 4,000 results using the same search parameters that were used in searching Joshua and Stephanie Mast's email accounts. Please let us know of any limiters that you believe will limit our search results to a more reasonable number.

Thank you.

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**From:** Eckstein, Maya <[meckstein@hunton.com](mailto:meckstein@hunton.com)>  
**Sent:** Tuesday, March 28, 2023 11:46 AM  
**To:** Shipman, Joseph C (Legal Affairs) <[jcshipman@liberty.edu](mailto:jcshipman@liberty.edu)>  
**Cc:** King, Jeremy <[JKing@hunton.com](mailto:JKing@hunton.com)>; Jenkins, Robin E (Legal Affairs) <[rjenkins22@liberty.edu](mailto:rjenkins22@liberty.edu)>  
**Subject:** [External] RE: Dropbox

